AZD 98 [illegible]

HAZARDOUS WASTE INSPECTION

Comments and Probable Violations

To: Waste Compliance/Enforcement ADEQ

Facility Name: Burlington Northern Santa Fe Railway

Inspection Date: March 31, 1998 **Previous:**

EPA ID Number: AZD981460678 **Facility Notified:** No

Inspection Type: Gen/1 **Referred By:**

Report Writer: Jon Anderla **Suggested Priority:** 14
Repeat Violations: None

	Facility	Compliance	Permits	TSD File	Other
Transmittal Date(s):	X 4/14/98	X			

Report Supplement(s):

	SAMPLE ANALYSIS	PHOTOS	SUBMITTAL FROM FACILITY	OTHER
Evidence Pending:			**Due Date:**_____	

Supplemental Date(s):

Suggested Referrals:

Other:

COMMENTS:

It appears as though BNSF (Phoenix) is not an LQG. The facility's hazardous waste generation consists of batteries sent off-site for recycling. These batteries should be managed as a universal or solid waste and not a hazardous waste. The batteries are generated when BNSF replaces the track signal batteries. The only other waste stream that has the potential to be a hazardous waste would be the facility's use of Naphtha solvent generated during locomotive maintenance. According to Mr. Gerardo Galvan, Relief Equipment Supervisor, approximately one 55 gallon drum of Naphtha solvent is used a month. However, according to BNSF purchasing records for 1997, approximately one 55 gallon drum is used every 5 months. Either way, the Naphtha solvent and used oil mixture that is generated is discharged to a fuel and oil/water separator and there has not been enough of the oil/Naphtha waste collected in the separator's tank to dispose off since the last non-hazardous oil mixture was removed off site in 1996. The facility was advised to discontinue to handle their batteries as hazardous waste and re-evaluate their generator status.

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
Governor Jane Dee Hull Russell F. Rhoades, Director

April 14, 1998
REF: 98-034

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gerardo Galvan, Relief Equipment Supervisor
Burlington Northern Santa Fe Railway
707 N. 20th Avenue
Phoenix, AZ 85009

Dear Mr. Galvan:

On March 31, 1998, a Hazardous Waste inspection was conducted at Burlington Northern Santa Fe Railway, Phoenix, AZ, EPA ID NO: AZD981460678 by representatives of the Arizona Department of Environmental Quality (ADEQ), Waste Programs Division. The inspection was conducted in accordance with the Arizona Revised Statutes Section 49-921 **et seq**.

The inspection, including any in-office record review, was done to evaluate your compliance with the Arizona Administrative Codes (AAC) R18-8-201 **et seq**. A copy of the inspection report has been included with this letter to apprise you of the conditions observed during the inspection.

If you have any questions concerning the above information, please contact your inspector, Jon Anderla, at (602) 207-4152.

Sincerely,

Laura L. Malone

Laura L. Malone, Manager
Hazardous Waste Inspections Unit
Waste Programs Division

Enclosure

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF WASTE PROGRAMS

HAZARDOUS WASTE INSPECTION REPORT

INSPECTION DATE: March 31, 1998

FACILITY NAME: Burlington Northern Santa Fe Railway

EPA ID NUMBER: AZD981460678

STREET ADDRESS: 707 N. 20th Avenue

CITY/STATE/ZIP: Phoenix, Arizona 85009

TELEPHONE NUMBER: (602) 382-5888

MAILING ADDRESS: Same as above

FACILITY REPRESENTATIVE(S) AND TITLE(S):

1. Gerardo Galvan, Relief Equipment Supervisor

ADEQ REPRESENTATIVE(S):

1. Jon Anderla, Hazardous Waste, Inspector
2. Stephanie Koes, Hazardous Waste, Inspector

OTHER PARTICIPANTS/AGENCIES:

None

NOTE: All regulatory citations to 40 CFR are as adopted by the Arizona Administrative Codes (A.A.C.) R18-8-201 **et seq**. Any omissions in this report shall not be construed as a determination of compliance with applicable regulations.

GENERATOR INFORMATION

1. **Generator Status, as Facility has Reported:** LQG
   RCRIS Status/Year: SQG (1986), LQG (1997)
   Facility Annual Report Status/Year: FAR for 1996 Activity

2. **Business Activity/Manufacturing Process Descriptions:**

   Railroad station activity. Changes out old track signal batteries for recycling and conducts general maintenance on locomotives.

3. **Other activities/permits:**
   Drywells: None
   Septic/sewer: Sewer
   Landfill/solid waste service: BFI
   Air quality permits: None
   Underground tanks permit: 3 UST lube oil tanks
   Groundwater permit: None
   Other (NPDES, etc): None

4. **Process and Associated Waste Generation and Handling Descriptions:**

Waste Code	Waste Stream	Handling Description
D002, D006	Acid/Cadmium based batteries (6 volt lantern batteries)	Generated by replacing track signal batteries which are sent for recycling.
Possible D001	Waste Naphtha/used oil mixture	Naphtha solvent used in degreasing of locomotives collected in oil/water separator. Since this waste stream has not yet been sent off site from the oil/water separator, no waste determination has been performed to determine if the waste is ignitable.

GENERAL INFORMATION

Representatives with the Arizona Department of Environmental Quality, Hazardous Waste Inspections Unit (ADEQ), conducted an inspection of Burlington Northern Santa Fe Railroad (BNSF) in Phoenix to verify if the facility was operating under a Large Quantity Generator (LQG) status. Based on observations during the inspection and documentation received by ADEQ from BNSF on April 7, 1998, it does not appear as though the facility is currently operating as an LQG. The only hazardous waste activity is the replacement of old railroad track signal batteries which are sent for recycling, and the generation of an oil and Naphtha solvent mixture in an oil/water separator. It was suggested to Mr. Gerardo Galvan, Relief Equipment Supervisor, that BNSF re-evaluate their battery waste stream as a non-hazardous waste and to re-evaluate their generator size class. The ADEQ inspectors also directed BNSF on a Hazardous Waste Inspection Exit Debriefing Form to ensure to perform a waste determination of the used oil/Naphtha mixture from the fuel/water separator prior to disposal.

ATTACHMENTS

1. Hazardous Waste Inspection Exit Debriefing Form, dated March 31, 1998
2. BNSF Site Maps
3. Correspondence from BNSF, dated April 7, 1998